

EXHIBIT A

LAW OFFICES OF MARTIN F. KRONBERG – ATTORNEY ID 262031970
2414 Morris Avenue, Suite 215, Union, N.J. 07083
(908) 624-1660
Attorney for Plaintiff

MARGARET NISIVOCIA,
Plaintiff,
vs.
NATIONAL RAILROAD PASSENGER CORPORATION:
d/b/a AMTRAK and JOHN DOES 1-10,
Defendants.

: SUPERIOR COURT OF NEW JERSEY
: LAW DIVISION: ESSEX COUNTY
: DOCKET NO.: ESX- L-
:
: CIVIL ACTION
:
: COMPLAINT AND JURY DEMAND
:

Plaintiff, Margaret Nisivoccia, residing in the City of Clifton, County of Passaic, and State of New Jersey,
complaining of the Defendants, deposes and says:

FIRST COUNT

1. On or about November 24, 2018, Plaintiff was lawfully on or about the #91 Amtrak train to Tampa at Newark Penn Station in the City of Newark, County of Essex, and State of New Jersey.
2. At all times relevant herein, Defendants, National Railroad Passenger Corporation d/b/a Amtrak and John Does 1-10, owned, occupied, operated, and/or maintained the train and adjacent area at Newark Penn Station in the City of Newark, County of Essex, and State of New Jersey.
3. Defendants, National Railroad Passenger Corporation d/b/a Amtrak and John Does 1-10, did so negligently and carelessly own, occupy, operate and/or maintain the aforesaid premises so as to cause a dangerous condition to exist thereon when luggage fell on Plaintiff. Furthermore, said Defendants negligently failed to supervise their employees on the premises, which negligent supervision caused a dangerous condition to exist thereon.
4. As a direct and proximate result of the negligence and gross negligence of the Defendants, as aforesaid, Plaintiff was caused to be injured due to the aforesaid dangerous condition and was thus caused to sustain

and did sustain serious and permanent personal injuries requiring the care and treatment of physicians, hospitalization, and medication and has been and will in the future continue to be hampered in her daily routine.

WHEREFORE, Plaintiff, Margaret Nisivoccia, demands judgment against the Defendants, National Railroad Passenger Corporation d/b/a Amtrak and John Does 1-10, jointly, severally or in the alternative in the amount of her damages together with interest and costs of suit.

DEMAND FOR TRIAL BY JURY

A trial by a jury is demanded in the within matter.

DESIGNATION OF TRIAL COUNSEL

Martin F. Kronberg, Esq., is hereby designated as trial counsel in the within matter on behalf of plaintiff.

CERTIFICATION PURSUANT TO RULE 4:5-1

I hereby certify that the within matter is not the subject matter of any other action pending in any court or of a pending arbitration proceeding, nor is such action contemplated. The names of all parties who should be presently joined in this action are named in the caption of this Complaint.

DATED: October 16, 2020

**By: /s/MARTIN F. KRONBERG
MARTIN F. KRONBERG**

Civil Case Information Statement

Case Details: ESSEX | Civil Part Docket# L-006938-20

Case Caption: NISIVOCIA MARGARET VS NATIONAL
RAILROAD PA SSEN

Case Initiation Date: 10/16/2020

Attorney Name: GREGORY FARRELL KRONBERG

Firm Name: MARTIN F. KRONBERG PC

Address: 2414 MORRIS AVE STE 215

UNION NJ 070830000

Phone: 9086241660

Name of Party: PLAINTIFF : Nisivoccia, Margaret

Name of Defendant's Primary Insurance Company
(if known): Unknown

Case Type: PERSONAL INJURY

Document Type: Complaint with Jury Demand

Jury Demand: YES - 6 JURORS

Is this a professional malpractice case? NO

Related cases pending: NO

If yes, list docket numbers:

**Do you anticipate adding any parties (arising out of same
transaction or occurrence)?** NO

Are sexual abuse claims alleged by: Margaret Nisivoccia? NO

THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

Do parties have a current, past, or recurrent relationship? NO

If yes, is that relationship:

Does the statute governing this case provide for payment of fees by the losing party? NO

**Use this space to alert the court to any special case characteristics that may warrant individual
management or accelerated disposition:**

Do you or your client need any disability accommodations? NO

If yes, please identify the requested accommodation:

Will an interpreter be needed? NO

If yes, for what language:

Please check off each applicable category: Putative Class Action? NO **Title 59?** NO **Consumer Fraud?** NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b)

10/16/2020

Dated

/s/ GREGORY FARRELL KRONBERG

Signed